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## VIA ECF AND FACSIMILE

Honorable Laura T. Swain  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 620  
New York, NY 10007

**RE: *Senisi v. John Wiley & Sons, Inc.*, No. 13-cv-3314 (LTS) (AJP)**

Dear Judge Swain,

This firm is counsel for Plaintiff Ellen Senisi (“Plaintiff”) in the above-referenced case against Defendant John Wiley & Sons, Inc. (“Defendant”). I write jointly with counsel for Defendant counsel pursuant to ¶ 1.f of Your Honor’s Individual Practices to request a stay of the upcoming deadlines for pre-trial submissions in the scheduling order entered by the Court on August 6, 2014 (Dkt. No. 55). Currently, the parties’ motions *in limine* are due, June 17, 2015 and the Joint Pre-trial statement is due July 17, 2015. The parties jointly request a stay of these deadlines given that the Court’s resolution of the pending motions for partial summary judgment likely will affect, or entirely moot, many issues that otherwise would be addressed in these filings.

This is the first request for a n extension or stay of these deadlines. The requested stay will not affect any other deadlines in this matter.

Respectfully submitted,



Kevin McCulloch